

1 James I. Stang (CA Bar No. 94435)
2 Andrew W. Caine (CA Bar No. 110345)
3 Gail Greenwood (CA Bar No. 169939)
4 Brittany M. Michael (*Pro Hac Vice*)
5 PACHULSKI STANG ZIEHL & JONES LLP
6 One Sansome Street, 34th Floor, Suite 3430
San Francisco, California 94104-4436
Telephone: 415-263-7000
Email: jstang@pszjlaw.com
acaine@pszjlaw.com
ggreenwood@pszjlaw.com
bmichael@pszjlaw.com

8 | *Attorneys for the Official Committee of
Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

12 | In re

Case No. 23-30564

13 THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO,

Chapter 11

Debtor and Debtor in Possession.

**OFFICIAL COMMITTEE OF
UNSECURED CREDITORS'
RESERVATION OF RIGHTS IN
RESPONSE TO MOTION BY DANIEL
EICHHORN TO ENLARGE THE
CLAIMS BAR DATE TO ACCEPT A
LATE FILED PROOF OF CLAIM**

Date: April 10, 2025
Time: 1:30 p.m.
Place: Via Zoom Teleconference
Judge: Hon. Dennis Montali

22 The Official Committee of Unsecured Creditors (the “Committee”) submits this
23 reservation of rights in response to the *Motion by Daniel Eichhorn to Enlarge the Claims Bar*
24 *Date to Accept a Late Filed Proof of Claim* [ECF No. 1036] (the “Motion”) filed by Daniel
25 Eichhorn (the “Movant”) who is represented by Mary Alexander & Associates, P.C.

07 | //

28

1 The Committee, having reviewed the Motion and in consideration of the Debtor's Status
2 Conference Statement (ECF No. 1080), the Committee is not opposing the Motion. However, the
3 Committee reserves its right to consider the full circumstances of the claim in any allocation protocols
4 that may be attached to any eventual reorganization plan in this case.

5
6 Dated: March 26, 2025

PACHULSKI STANG ZIEHL & JONES LLP

7
8 By /s/ James I. Stang _____

9 James I. Stang
10 Andrew W. Caine
11 Gail Greenwood
12 Brittany M. Michael
13 One Sansome Street, 34th Floor, Suite 3430
14 San Francisco, California 94104-4436
15 Telephone: 415-263-7000
16 Email: jstang@pszjlaw.com
17 acaine@pszjlaw.com
18 ggreenwood@pszjlaw.com
19 bmichael@pszjlaw.com

20
21 *Attorneys for the Official Committee of Unsecured
22 Creditors*